

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GARY NAPIER,

Plaintiff,

v.

MARIA PAPPAS, in her official capacity as
Treasurer and Ex Officio County Collector
of Cook County; MONICA GORDON, in her
official capacity as Clerk of Cook County,
COOK COUNTY, ILLINOIS, an Illinois
political subdivision unit of government;
KWAME RAOUL, in his official capacity as
Attorney General of the State of Illinois, and
DAVID HARRIS, in his official capacity as
Director of the Illinois Department of
Revenue,

Defendants.

Case No. 1:25 CV 5908

**MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSES
TO MOTIONS TO DISMISS**

NOW COMES the Plaintiff, GARY NAPIER, by and through undersigned counsel, and, pursuant to F.R. Civ. P. 6(b), requests an enlargement of time for his Responses to the Defendants' Motions to Dismiss, until October 20, 2025. In support of his Motion, Napier states as follows:

1. On August 29, 2025, the Defendants filed Rule 12(b)(6) Motions to Dismiss (Dkt. ## 32, 35, 36). Napier's Response is due October 10, 2025 (Dkt. # 41).

2. However, despite due diligence, due to the immediate demands of Plaintiff's counsel's caseload, Napier requests the due date for his Responses to Defendants' Motions to Dismiss be extended an additional 12 days, or until October

22, 2025. Any Replies would be due November 5, 2025, though Plaintiff would not object to any accommodations Defendants would need for a Reply.

3. If Plaintiff submits the Responses on or prior to the presentation date of this Motion, Plaintiff requests this Motion be converted to a request to file *instanter*. Plaintiff would still accommodate Defendants' needs regarding a Reply date.

4. This Motion is not filed for dilatory purposes or for delay, but only so Plaintiff may fully present his arguments before the Court.

WHEREFORE, the Plaintiff, GARY NAPIER, requests this Honorable Court grant him an enlargement of 12 days to October 22, 2025 to file his Responses to Defendants' Motions to Dismiss, and grant him any and all other forms of relief as this Court deems just and proper.

Dated: October 10, 2025

Respectfully submitted,

By: /s/ David G. Sigale
Attorney for Plaintiff

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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On October 10, 2025, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R. Civ. P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
Attorney for Plaintiff

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